

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

JOLENE FURDEK and JONATHAN RYAN,  
on behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

AMAZON.COM, INC., a Delaware  
corporation, and APPLE INC., a California  
corporation,

Defendants.

Case No. 2:22-cv-01599-KKE

**PLAINTIFFS' RESPONSE TO  
DEFENDANTS' MOTION FOR  
ATTORNEYS' FEES AND COSTS**

**NOTE ON MOTION CALENDAR:**  
May 23, 2025

Counsel for Plaintiffs respectfully offer this response to Defendants' motion for fees and costs.

Plaintiffs' counsel will not oppose payment of the fees and costs Defendants have requested.

We respect the Court's judgment and concerns and, with hindsight, recognize the situation could have been handled better. Plaintiffs' counsel will redouble their efforts to ensure that this case is conducted with the highest degree of professionalism by all involved. The Court should take confidence, based on the reputation Plaintiffs' counsel have built through nearly forty years of practice, which includes many complicated class actions in this district and throughout the nation, that this will be done.

DATED: May 19, 2025

Respectfully submitted,

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1 I certify that this brief contains 105 words, in compliance with the Local Civil Rules.

2 /s/ Steve W. Berman

3 Steve W. Berman

**CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2025, a true and correct copy of the foregoing was filed electronically by CM/ECF, which caused notice to be sent to all counsel of record.

/s/ Steve W. Berman  
Steve W. Berman